

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

MANDY DANDERSON,

Plaintiffs,

v.

**WALMART EAST, LP, and
THOMASINA GONZALES**

Defendant.

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No.: 2:21-CV-00____

DECLARATION OF GEOFFREY EDWARDS

Under penalty of perjury, Geoffrey Edwards hereby attests to the following:

1. My name is Geoffrey Edwards. I am a Managing Counsel in the Legal Department for Defendant Walmart. I am over the age of 18 and am competent to testify to the matters set forth herein. The facts stated herein are based on my personal knowledge or based on my review of records of Defendant that are made and kept in the regular course of business by someone with knowledge.
2. In my position, I have knowledge of and am familiar with Defendant Walmart East, LP's corporate structure, including the entities that comprise that entity, as well as the citizenship of those entities.
3. Defendant Walmart East LP is correctly named Wal-Mart Stores East, LP, a Delaware limited partnership, is an indirect, wholly-owned subsidiary of Walmart Inc. Wal-Mart Stores East, LP's principal place of business is 702 SW 8th Street, Bentonville, Arkansas 72716.
4. Walmart Inc.'s principal place of business is 702 SW 8th Street, Bentonville, Arkansas 72716, and Walmart Inc. is incorporated in Delaware.

5. WSE Management, LLC, a Delaware limited liability company, is the general partner and WSE Investment LLC, a Delaware limited liability company, is the limited partner.
6. The sole member of WSE Management, LLC and WSE Investment LLC is Wal-Mart Stores East, LLC, an Arkansas limited liability company, whose parent company is Walmart Inc.
7. I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on October 5, 2021.



GEOFFREY EDWARDS